

### Remarks

Claims 1-24 are pending in the instant application. Claims 1, 10 and 19 are amended herein.

### Rejection under 35 USC 112

#### Claims 1-24

In the Office Action, the Examiner rejected Claims 1-24 under 35 USC 112, first paragraph, as failing to comply with the enablement requirement. In particular, the term immediately does not appear in the disclosure.

Applicant respectfully states that the term immediately has been removed from Claims 1-24. Therefore, the rejection under 35 USC 112, first paragraph, is moot.

#### Claims 1-24

In the Office Action, the Examiner rejected Claims 1-24 under 35 USC 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the Invention. In particular, it is not clear how to determine the scope of immediately chronologically track.

Applicant respectfully states that the term immediately chronologically track has been removed from Claims 1-24. Therefore, the rejection under 35 USC 112, second paragraph, is moot.

### Rejection under 35 USC 102(b)

#### Claims 1-24

In the Office Action, the Examiner rejected Claims 1-24 under 35 U.S.C. § 102(b) as being anticipated by Allen et al. (5,675,802). The Applicant has reviewed the cited reference and respectfully submits that the embodiments of

the present invention that are set forth in Claims 1-24 are not shown, anticipated or suggested by Allen et al.

Applicant respectfully states that Claims 1, 10 and 19 include the feature "receiving a copy of the selected one of said software product versions at said one client, wherein the selecting and receiving of one of the software product versions for updating does not limit a second client from selecting and receiving the same one of the software product versions received by said one client from said single database." The details of the Claimed limitation are supported in the Specification including page 15 lines 20-27 and page 16 lines 5-8.

Applicant respectfully disagrees that Allen et al. anticipates the claimed feature. Applicant understands Allen et al. to teach that a branch can be independently checked out and checked in (i.e., new versions added) by a single user at a time. Moreover, Applicant understands Allen et al. to teach that the storage devices restrict the capability to modify each branch to a single user at a time at the local development site. Applicant further understands the method taught by Allen et al., e.g., to limit the access to a single user and having a checkout process from a repository, teaches directly toward problems addressed in the background of the Application (Specifically, page 3 lines 15-19).

Therefore, Applicant respectfully states that Allen et al. does not teach or anticipate the database allowing a plurality of quality assurance engineers to be working on the same image, resulting in a unified testing process as stated in Claims 1, 10 and 19. In fact, Applicant respectfully understands Allen et al. to teach directly away from the Claimed features. Thus, Applicant respectfully states that Claims 1, 10 and 19 overcome the rejection under 35 USC 102(b) and are in condition for allowance.

Accordingly, Applicant also respectfully submits that Allen et al. does not anticipate or render obvious the present claimed invention as is recited in Claims

2-9 dependent on Claim 1, Claims 11-18 dependent on Claim 10 and Claims 20-24 dependent on Claim 19 and that these Claims overcome the rejection under 35 U.S.C. 102(b) as being dependent on an allowable base claim.

Conclusion

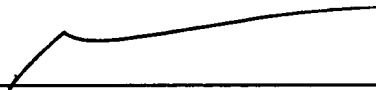
In light of the above remarks, Applicant respectfully requests allowance of the now allowable Claims 1-24.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present application.

Respectfully submitted,  
Wagner, Murabito & Hao LLP

Date: \_\_\_\_\_

12/22/05



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